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June 11, 2021

**By ECF**

The Honorable John G. Koeltl  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, New York 10007-1312

Re: Roché Cyrulnik Freedman LLP v. Cyrulnik, Case No. 1:21-cv-01746 (JGK)

Dear Judge Koeltl:

Pursuant to Rule 6.A.2 of Your Honor's Individual Practices, I write on behalf of Defendant Jason Cyrulnik to request permission to file under temporary seal certain documents in support of Defendant's motion to dismiss, which is being filed concurrently herewith.

Defendant intends to reference and/or exhibit certain documents and information Plaintiff contends are confidential and warrant sealing.

Although Defendant does not believe the materials warrant sealing, we make this request in the interest of affording Plaintiff the opportunity to file a motion for longer-term sealing, to which motion Defendant will respond in due course. In accordance with Rule 6.A.2 of your Honor's Individual Practices, we have notified Plaintiff of its obligation to file a letter within three days explaining the need to seal the materials.

We thank the Court for its consideration of this request.

Respectfully,

/s/ Gavin D. Schryver

Gavin D. Schryver

cc: Counsel of Record (via ECF)